

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Kenneth Garbarino

Title: Director

REQUEST: Department of Telecommunications and Energy, Record Requests

DATED: November 18, 1999

ITEM: DTE RR 71 Would BA-MA provide compensation to a CLEC if an outage resulted from a hot-cut miss that was BA-MA's error? If the answer is negative, please provide an explanation.

REPLY: Hot Cuts are included in the Consolidated Arbitration results for UNE maintenance and provisioning. UNE performance and results drive self-executing remedies as defined by the Consolidated Arbitrations.

NET RR# 71

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Stuart Miller

Title: Vice-President

REQUEST: Department of Telecommunications and Energy, Record Requests

DATED: November 22, 1999

ITEM: DTE RR 98 Provide a status on BA's commitments, contained on page 37 of the DOJ's NY evaluation, footnote 100, to improve wholesale performance.

REPLY: BA's commitments, outlined on page 37 of the DOJ's NY evaluation, footnote 100, to improve wholesale performance are as follows:

(1) take steps to ensure that preorder response times remain adequate as order volumes increase; (2) improve LSRC and reject response times pursuant to monetary incentives in the ARAP; (3) increase flow-through in a three-stage plan over the next several months; (4) improve "change control" compliance after long distance entry based on financial incentives in the ACCAP; (5) improve compliance with hot cut procedures after long distance entry by instituting a new measuring and reporting process; (6) disaggregate data relating to reported installation problems after long distance entry; (7) institute many process improvements for ordering and provisioning of DSL loops in the ongoing collaborative process; (8) implement process improvements for repair of complex loops; and, (9) provide unbundled "dark fiber" transport to CLECs.

The following outlines the status of each of the BA-NY commitments:

(1) BA-NY continually monitors the volumes the systems receive. As volumes increase Bell Atlantic can add capacity as warranted. For normal planning purposes, capacity can be scheduled for addition to front end gateway systems in twelve weeks or, as necessary, in three weeks on an emergency basis. In the event capacity limitations are shown to be exceeded in

REPLY: DTE RR 98
(cont'd)

the back end systems, thus effecting both wholesale and retail service levels, additional capacity can be added in three months normally or, as necessary, in seven weeks on an emergency basis. Recently, in response to CLEC concerns regarding the response times of the Phase III GUI, Bell Atlantic installed a new additional machine to split CLEC traffic between two servers. The installation of this new machine reduced the pre-order response times. In addition, Bell Atlantic discovered that pre-order transactions were queuing up at the middleware affecting all pre-order interfaces. In order to address this issue, Bell Atlantic increased the number of connections between the middleware and the front end which not only decreased pre-order response times but also assures the receipt of all pre-order responses.

Other major improvements are also being made. An additional \$20M of processing units and storage capacity has been purchased and will be implemented in January 2000 to further enhance the capabilities of the interfaces.

- (2) BA-NY has been improving LSRC and LSR reject response times by taking the following actions: 1) increasing flow through, 2) continuing CLEC education efforts, and 3) continuing the expansion of TISOC capacity.

In addition to the systems changes committed to in BA-NY's three stage plan to increase flow through (see response to item 3), BA-NY has identified four systems changes which were implemented on December 20th, and which will materially increase resale flow through. These changes will provide flow through on orders that, prior to the systems changes, generated a significant number of error messages to the CLECs. Furthermore, BA-NY has an ongoing effort to review the most frequently occurring error messages. A root cause analysis of the error messages is performed in order to determine if the errors are impacting flow through. For those errors that are impacting flow through BA-NY takes corrective actions including implementing mechanized solutions and addressing issues through training.

REPLY: DTE RR 98
(cont'd)

BA-NY has begun the process of holding "monthly workshops to address specifically the improvement of LSR order quality." The first workshop was held on November 10th and the next workshop was held December 15th. BA-NY believes that the workshops were both effective and well received. Four specific errors were discussed at the first workshop. Thereafter, the volume of three of these errors declined noticeably. Each workshop will be based on an extensive root cause analysis of the top flow through errors for the previous month.

These monthly meetings are in addition to the feedback that BA-NY provides to individual CLECs in the regular course of business. To enhance BA-NY's and CLECs' ability to analyze the causes of non-flow through orders, BA-NY recently developed the ability to produce a complete inventory of flow through errors by individual CLEC and by mode of entry (i.e., UNE-P, UNE loops, and resale). This diagnostic tool should enable CLECs more effectively to manage their ordering process and to reduce ordering errors, which will increase BA-NY's flow through rates. Beginning with the December workshop, BA-NY will offer to provide CLEC-specific error analysis and to meet individually with CLECs that are interested in exploring in more depth how the root cause information relates to their individual results.

Even with the marked gains in flow through apparent from the October enhancements, BA-NY recognizes that it must continue to increase the capacity of the TISOC to deal with increasingly complex resale orders, as well as the volumes of orders not yet eligible for Level 5 flow through. By the end of December, the TISOC will have 406 fully trained representatives available to assist CLECs in New York and New England. On January 15, 2000 a new center in Boston, Massachusetts will open with capacity for 120 new representatives.

- (3) In the Miller/Sullivan/Zanfini Affidavit of October 8, 1999, BA-NY set out a three-phase plan to increase overall flow through levels. After meeting with CLECs, 4 of the 5 "Phase I" changes were implemented on October 30th. The invalid address systems change was not made following discussions with CLECs.

REPLY: DTE RR 98
(cont'd)

Phase II was implemented, as planned, on December 20th, except that three of the changes continue to be under discussion and have been delayed based upon discussions with the affected CLECs. The status of the Phase III changes, which are scheduled to be implemented by the end of the second quarter 2000, remain unchanged. Attachment 1 to this response provides an overview and status of the three-phase plan.

- (4) Bell Atlantic has made numerous improvements to the Change Control process in order to increase its responsiveness to CLECs' requirements and concerns. Bell Atlantic reorganized and formed a Vice President organization dedicated to CLEC Change Management, doubling the resources focusing on change control. Within this organization Bell Atlantic created a Requirements team dedicated to working more closely with the CLECs on determining the systems requirements of their Change Requests. In addition, this team works with CLECs to help them understand the details of upcoming releases. To facilitate the ease of use, Bell Atlantic reorganized how the CLEC Change Management materials and information were posted on the WEB. Numerous workshops have been held, and continue on a monthly basis, to assist CLECs in understanding the Change Management process. The following provides a list of some of these workshops: 1) Prioritization/Scheduling Process, 2) Timelines for Type 3-5 Change Requests, 3) Backward Compatibility, 4) Web GUI Phase III, 5) CLEC Testing Environment, and 6) Flow Through. Bell Atlantic continues to distribute Change Management materials to specified individuals employed by the CLECs. Since July 1999, Bell Atlantic's distribution list has grown from under three hundred to over four hundred individuals.
- (5) BA-NY has agreed to revise the measurements associated with the hot cut provisioning process. Specifically, BA-NY has agreed to capture CLEC dial tone problems as "misses" if they are not identified to the CLEC by 2:30 PM EST on DD-2 (due date minus 2) and the order is pushed out beyond the original due date. In addition, in accordance with the NYPSC's November 5, 1999 order, the percent on time hot cut metric has been disaggregated into percentage early cuts, percentage late cuts and percentage defective cuts. Besides these categories,

REPLY: DTE RR 98
(cont'd)

which are already captured in the overall on time result, BA-NY has sought clarification from the NYPSC on three new hot cut measures: 1) duration of service interruption, 2) frequency of service interruption, and 3) percent supplemented or cancelled orders at BA-NY's request. BA has worked closely with the CLEC community to improve the process. As these efforts continue, all companies will migrate to a non-coordinated form of hot cuts, thus eliminating virtually all of the subcategories proposed in the ACCAP.

- (6) BA-NY has proposed that installation codes (I-codes), measuring troubles reported within seven days of installation, should be disaggregated to show hot cut troubles specifically.
- (7) On August 10, 1999 the NYDPS convened a collaborative among BA-NY, NYDPS, NYPSC Staff, and competitors currently or potentially offering xDSL services. "The xDSL collaborative has resulted in BA-NY filing tariffed rates for loop information queries, including a mechanized database query, manual query, and engineering record search. Although CLECs dispute the proposed charges for this information, they agree that all the information required is available." (Evaluation of New York Public Service Commission, Bell Atlantic – New York, October 19, 1999 at page 93.) A provisioning process, based on cooperative testing, for xDSL capable loops has been agreed to by the participants of the collaborative. BA-NY has provided additional guidance to its installation technicians and BA-NY is tracking provisioning milestones. Finally, BA-NY recommended and it is expected that the NYPSC will adopt xDSL specific metrics.
- (8) As described in item 7, BA-NY, through the collaborative process, has implemented a provisioning process for xDSL capable-loops. BA-NY believes that these improved provisioning procedures should also result in a reduced number of installation trouble reports within 30 days.
- (9) BA-MA offers and provides dark fiber through its interconnection agreements.

NEW ENGLAND TELEPHONE AND TELEGRAPH COMPANY

COMMONWEALTH OF MASSACHUSETTS

D.T.E. 99-271

Respondent: Stuart Miller

Title: Vice President

Respondent: Julie Canny

Title: Managing Director

Respondent: Kenneth Garbarino

Title: Director

REQUEST: Department of Telecommunications and Energy, Record Requests

DATED: November 23, 1999

ITEM: DTE RR 126 Provide the cite from the technical conference in NY where KPMG discussed the use of the EnView scripts by BA-NY to measure systems response times.

REPLY: At the Technical Conference held November 23, 1999, in Massachusetts, Bell Atlantic witness, Ms. Canny, reported that KPMG had concluded this area of its review as "satisfied with qualifications", but recollected that KPMG had also commented on this issue at the Technical Conference in New York. Specifically, Ms. Canny stated: "The final document on the report indicated the qualifications were still there. However, on the stand at the technical conference they indicated that it made no difference, no significant difference." (MA Technical Conference Transcript, page 2445, 11/23/99)

On review, Ms. Canny has determined that KPMG's testimony indicated that time of day does not have an effect upon the measurements made by Sentinal (now Enview). (NY Technical Conference Transcript, page 3394, 7/27/99). However, KPMG indicated the same qualifications with respect to the randomness of simulated transactions as it did in the final report. (NY Technical Conference Transcript, pages 3396-3398, 7/27/99)

This qualification has been separately addressed by the parties in the NY PSC Carrier to Carrier proceeding (Case 97-C-0139). The NY PSC's Order issued on June 30, 1999, stated that "Proposed

REPLY: DTE RR 126
(cont'd)

Resolution: Bell Atlantic – New York should specify in PO-1 of the Carrier Guidelines how the Sampled transactions are drawn in terms of quantities and randomness throughout the day (CLEC vs. Bell Atlantic - New York retail) and the basis therefor. The parties may give further consideration to these matters in the next phase of the proceeding.” (Order at page 3)

BA-NY thereafter addressed the PSC’s requirements and BA-NY’s response was the subject of the collaborative discussions among the parties to that proceeding. The PSC resolved this issue in its Carrier-to-Carrier Order issued on November 5, 1999, stating that BA-NY had “... provided this (required) information, and the matter has been fully aired by the parties. The definition and methodology sections of PO – 1 have been rewritten to reflect the understanding reached by the parties.” (Order at page 14). On November 15, 1999, BA-NY filed its specifications for PO-1 in accordance with the collaborative discussions and the directions of the NY PSC.